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**BEFORE THE
DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:)

PEDRO CARRILLO, M.D.)

File No. 04-2001-120674

**Physician's and Surgeon's)
Certificate No. G 55750)**

Respondent.)

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Division of Medical Quality of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on April 28, 2004.

IT IS SO ORDERED March 29, 2004.

MEDICAL BOARD OF CALIFORNIA

By: _____

Lorie G. Rice, Chair

Panel A

Division of Medical Quality

1 BILL LOCKYER, Attorney General
2 of the State of California
3 JOHN E. DeCURE, State Bar No. 150700
4 Deputy Attorney General
5 California Department of Justice
6 300 So. Spring Street, Suite 1702
7 Los Angeles, CA 90013
8 Telephone: (213) 897-8854
9 Facsimile: (213) 897-1071

10 Attorneys for Complainant

11 **BEFORE THE**
12 **DIVISION OF MEDICAL QUALITY**
13 **MEDICAL BOARD OF CALIFORNIA**
14 **DEPARTMENT OF CONSUMER AFFAIRS**
15 **STATE OF CALIFORNIA**

16 In the Matter of the Accusation Against:

17 PEDRO CARRILLO, M.D.
18 225 E. 2nd Avenue
19 Escondido, California 92025

20 Physician and Surgeon's Certificate No. G 55750

21 Respondent.

Case No. 04-2001-120674

OAH No. L-2003-041017

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

22 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
23 above-entitled proceedings that the following matters are true:
24

25 PARTIES

26 1. Ron Joseph (Complainant) is the Executive Director of the Medical Board
27 of California (Medical Board). He brought this action solely in his official capacity and is
28 represented in this matter by Bill Lockyer, Attorney General of the State of California, by John E.
DeCure, Deputy Attorney General.

2. Respondent Pedro Carrillo (Respondent) is represented in this proceeding
by attorney Timothy J. Stafford, whose address is Stafford & Associates, 15 Enterprise, Suite
430, Aliso Viejo, CA 92656.

3. On or about August 19, 1985, the Medical Board issued Physician and Surgeon's Certificate No. G 55750 to Respondent. The Physician and Surgeon's Certificate is current and will expire on September 30, 2004, unless renewed.

JURISDICTION

4. Accusation No. 04-2001-120674 was filed before the Division of Medical Quality (Division) for the Medical Board, Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 11, 2002. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 04-2001-120674 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 04-2001-120674. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 04-2001-120674.

9. Respondent agrees that his Physician and Surgeon's Certificate is subject

1 to discipline and he agrees to be bound by the Division's imposition of discipline as set forth in
2 the Disciplinary Order below.

3 CONTINGENCY

4 10. This stipulation shall be subject to approval by the Division of Medical
5 Quality. Respondent understands and agrees that counsel for Complainant and the staff of the
6 Medical Board of California may communicate directly with the Division regarding this
7 stipulation and settlement, without notice to or participation by Respondent or his counsel. By
8 signing the stipulation, Respondent understands and agrees that he may not withdraw his
9 agreement or seek to rescind the stipulation prior to the time the Division considers and acts upon
10 it. If the Division fails to adopt this stipulation as its Decision and Order, the Stipulated
11 Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall
12 be inadmissible in any legal action between the parties, and the Division shall not be disqualified
13 from further action by having considered this matter.

14 11. The parties understand and agree that facsimile copies of this Stipulated
15 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
16 force and effect as the originals.

17 12. In consideration of the foregoing admissions and stipulations, the parties
18 agree that the Division may, without further notice or formal proceeding, issue and enter the
19 following Disciplinary Order:

20 DISCIPLINARY ORDER

21 IT IS HEREBY ORDERED that Physician and Surgeon's Certificate No. G 55750
22 issued to Respondent Pedro Carrillo, M.D., is revoked. However, the revocation is stayed and
23 Respondent is placed on probation for three (3) years on the following terms and conditions.

24 1. CLINICAL TRAINING PROGRAM Within 60 calendar days of the
25 effective date of this Decision, respondent shall enroll in a clinical training or educational
26 program equivalent to the Physician Assessment and Clinical Education Program (PACE)
27 offered at the University of California - San Diego School of Medicine ("Program").

28 The Program shall consist of a Comprehensive Assessment program comprised of

1 a two-day assessment of respondent's physical and mental health; basic clinical and
2 communication skills common to all clinicians; and medical knowledge, skill and judgment
3 pertaining to respondent's specialty or sub-specialty, and at minimum, a 40 hour program of
4 clinical education in the area of practice in which respondent was alleged to be deficient and
5 which takes into account data obtained from the assessment, Decision(s), Accusation(s), and any
6 other information that the Division or its designee deems relevant. Respondent shall pay all
7 expenses associated with the clinical training program.

8 Based on respondent's performance and test results in the assessment and clinical
9 education, the Program will advise the Division or its designee of its recommendation(s) for the
10 scope and length of any additional educational or clinical training, treatment for any medical
11 condition, treatment for any psychological condition, or anything else affecting respondent's
12 practice of medicine. Respondent shall comply with Program recommendations.

13 At the completion of any additional educational or clinical training, respondent
14 shall submit to and pass an examination. The Program's determination whether or not
15 respondent passed the examination or successfully completed the Program shall be binding.

16 Respondent shall complete the Program not later than six months after
17 respondent's initial enrollment unless the Division or its designee agrees in writing to a later time
18 for completion.

19 Failure to participate in and complete successfully all phases of the clinical
20 training program outlined above is a violation of probation.

21 2. NOTIFICATION Prior to engaging in the practice of medicine during
22 probation, the respondent shall provide a true copy of the Decision(s) and Accusation(s) to the
23 Chief of Staff or the Chief Executive Officer at every hospital where privileges or membership
24 are extended to respondent, at any other facility where respondent engages in the practice of
25 medicine, including all physician and locum tenens registries or other similar agencies, and to the
26 Chief Executive Officer at every insurance carrier which extends malpractice insurance coverage
27 to respondent. Respondent shall submit proof of compliance to the Division or its designee
28 within 15 calendar days.

1 This condition shall apply to any change(s) in hospitals, other facilities or
2 insurance carrier.

3
4 3. SUPERVISION OF PHYSICIAN ASSISTANTS During probation,
5 respondent is prohibited from supervising physician assistants.

6 4. OBEY ALL LAWS Respondent shall obey all federal, state and local
7 laws, all rules governing the practice of medicine in California, and remain in full compliance
8 with any court ordered criminal probation, payments and other orders.

9 5. QUARTERLY DECLARATIONS Respondent shall submit quarterly
10 declarations under penalty of perjury on forms provided by the Division, stating whether there
11 has been compliance with all the conditions of probation. Respondent shall submit quarterly
12 declarations not later than 10 calendar days after the end of the preceding quarter.

13 6. PROBATION UNIT COMPLIANCE Respondent shall comply with the
14 Division's probation unit. Respondent shall, at all times, keep the Division informed of
15 respondent's business and residence addresses. Changes of such addresses shall be immediately
16 communicated in writing to the Division or its designee. Under no circumstances shall a post
17 office box serve as an address of record, except as allowed by Business and Professions Code
18 section 2021(b).

19 Respondent shall not engage in the practice of medicine in respondent's place of
20 residence. Respondent shall maintain a current and renewed California physician's and
21 surgeon's license.

22 Respondent shall immediately inform the Division, or its designee, in writing, of
23 travel to any areas outside the jurisdiction of California which lasts, or is contemplated to last,
24 more than 30 calendar days.

25 7. INTERVIEW WITH THE DIVISION, OR ITS DESIGNEE Respondent
26 shall be available in person for interviews either at respondent's place of business or at the
27 probation unit office, with the Division or its designee, upon request at various intervals, and
28 either with or without prior notice throughout the term of probation.

1 8. RESIDING OR PRACTICING OUT-OF-STATE In the event respondent
2 should leave the State of California to reside or to practice, respondent shall notify the Division
3 or its designee in writing 30 calendar days prior to the dates of departure and return. Non-
4 practice is defined as any period of time exceeding 30 calendar days in which respondent is not
5 engaging in any activities defined in Sections 2051 and 2052 of the Business and Professions
6 Code.

7 All time spent in an intensive training program outside the State of California
8 which has been approved by the Division or its designee shall be considered as time spent in the
9 practice of medicine within the State. A Board-ordered suspension of practice shall not be
10 considered as a period of non-practice. Periods of temporary or permanent residence or practice
11 outside California will not apply to the reduction of the probationary term. Periods of temporary
12 or permanent residence or practice outside California will relieve respondent of the responsibility
13 to comply with the probationary terms and conditions with the exception of this condition and
14 the following terms and conditions of probation: Obey All Laws; Probation Unit Compliance;
15 and Cost Recovery.

16 Respondent's license shall be automatically canceled if respondent's periods of
17 temporary or permanent residence or practice outside California total two years. However,
18 respondent's license shall not be canceled as long as respondent is residing and practicing
19 medicine in another state of the United States and is on active probation with the medical
20 licensing authority of that state, in which case the two year period shall begin on the date
21 probation is completed or terminated in that state.

22 9. FAILURE TO PRACTICE MEDICINE - CALIFORNIA RESIDENT

23 In the event respondent resides in the State of California and for any reason
24 respondent stops practicing medicine in California, respondent shall notify the Division or its
25 designee in writing within 30 calendar days prior to the dates of non-practice and return to
26 practice. Any period of non-practice within California, as defined in this condition, will not
27 apply to the reduction of the probationary term and does not relieve respondent of the
28 responsibility to comply with the terms and conditions of probation. Non-practice is defined as

1 any period of time exceeding 30 calendar days in which respondent is not engaging in any
2 activities defined in sections 2051 and 2052 of the Business and Professions Code.

3 All time spent in an intensive training program which has been approved by the
4 Division or its designee shall be considered time spent in the practice of medicine. For purposes
5 of this condition, non-practice due to a Board-ordered suspension or in compliance with any
6 other condition of probation, shall not be considered a period of non-practice.

7 Respondent's license shall be automatically canceled if respondent resides in
8 California and for a total of two years, fails to engage in California in any of the activities
9 described in Business and Professions Code sections 2051 and 2052.

10 10. COMPLETION OF PROBATION Respondent shall comply with all
11 financial obligations (e.g., cost recovery, restitution, probation costs) not later than 120 calendar
12 days prior to the completion of probation. Upon successful completion of probation,
13 respondent's certificate shall be fully restored.

14 11. VIOLATION OF PROBATION Failure to fully comply with any term or
15 condition of probation is a violation of probation. If respondent violates probation in any respect,
16 the Division, after giving respondent notice and the opportunity to be heard, may revoke
17 probation and carry out the disciplinary order that was stayed. If an Accusation, Petition to
18 Revoke Probation, or an Interim Suspension Order is filed against respondent during probation,
19 the Division shall have continuing jurisdiction until the matter is final, and the period of
20 probation shall be extended until the matter is final.

21 12. COST RECOVERY The Medical Board waives recovery of its
22 investigative and prosecution costs in this matter.

23 13. LICENSE SURRENDER Following the effective date of this Decision, if
24 respondent ceases practicing due to retirement, health reasons or is otherwise unable to satisfy
25 the terms and conditions of probation, respondent may request the voluntary surrender of
26 respondent's license. The Division reserves the right to evaluate respondent's request and to
27 exercise its discretion whether or not to grant the request, or to take any other action deemed
28 appropriate and reasonable under the circumstances. Upon formal acceptance of the surrender,

1 respondent shall within 15 calendar days deliver respondent's wallet and wall certificate to the
2 Division or its designee and respondent shall no longer practice medicine. Respondent will no
3 longer be subject to the terms and conditions of probation and the surrender of respondent's
4 license shall be deemed disciplinary action. If respondent re-applies for a medical license, the
5 application shall be treated as a petition for reinstatement of a revoked certificate.

6 14. PROBATION MONITORING COSTS Respondent shall pay the costs
7 associated with probation monitoring each and every year of probation, as designated by the
8 Division, which are currently set at \$2,874, but may be adjusted on an annual basis. Such costs
9 shall be payable to the Medical Board of California and delivered to the Division or its designee
10 no later than January 31 of each calendar year. Failure to pay costs within 30 calendar days of
11 the due date is a violation of probation.

1 ACCEPTANCE

2 I have carefully read the above Stipulated Settlement and Disciplinary Order and
3 have fully discussed it with my attorney, Timothy J. Stafford. I understand the stipulation and
4 the effect it will have on my Physician and Surgeon's Certificate. I enter into this Stipulated
5 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
6 bound by the Decision and Order of the Division of Medical Quality, Medical Board of
7 California.

8 DATED: 2/10/2004

9 

10 PEDRO CARRILLO, M.D.
11 Respondent

12
13 I have read and fully discussed with Respondent Pedro Carrillo, M.D., the terms
14 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
15 Order. I approve its form and content.

16 DATED: 2/17/04

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19 TIMOTHY J. STAFFORD
20 Attorney for Respondent


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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Division of Medical Quality, Medical Board of California of the Department of Consumer Affairs.

DATED: March 4, 2004

BILL LOCKYER, Attorney General
of the State of California


JOHN E. DeCURE
Deputy Attorney General

Attorneys for Complainant

DOJ Docket/Matter ID Number: 03573160-LA02 2200
Carrillo.stip.wpd

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Exhibit A
Accusation No. 04-2001-120674

1 BILL LOCKYER, Attorney General
of the State of California
2 JOHN E. DeCURE, State Bar No. 150700
Deputy Attorney General, for
3 KAREN B. CHAPPELLE
Deputy Attorney General
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7 Attorneys for Complainant

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO December 11, 20 02
BY Valerie Moore ANALYST

8
9 **BEFORE THE**
10 **DIVISION OF MEDICAL QUALITY**
11 **MEDICAL BOARD OF CALIFORNIA**
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 04-2001-120674

13 PEDRO CARRILLO, M.D.
14 P.O. Box 1062
Cedar Glen, CA 92321

ACCUSATION

15 Physician & Surgeon's Certificate No. G55750

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Ron Joseph (Complainant) brings this Accusation solely in his official
21 capacity as the Executive Director of the Medical Board of California, Department of Consumer
22 Affairs.

23 2. On or about August 19, 1985, the Medical Board of California issued
24 Physician & Surgeon's Certificate Number G55750 to Pedro Carrillo, M.D. (Respondent). The
25 Physician & Surgeon's Certificate is current and will expire on September 30, 2004, unless
26 renewed.

27 **JURISDICTION**

28 3. This Accusation is brought before the Division of Medical Quality

(Division) for the Medical Board of California, Department of Consumer Affairs under the authority of the below mentioned statutes and regulations.¹

4. Section 2227 of the Code provides that a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other action taken in relation to discipline as the Division deems proper.

5. Section 2234 of the Code states:

“The Division of Medical Quality shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

“(a) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate, any provision of this chapter [Chapter 5, the Medical Practice Act].

“(b) Gross negligence.

“(c) Repeated negligent acts.

“(d) Incompetence.

“(e) The commission of any act involving dishonesty or corruption which is substantially related to the qualifications, functions, or duties of a physician and surgeon.

“(f) Any action or conduct which would have warranted the denial of a certificate.”

6. Section 2266 of the Code provides that the failure of a physician and surgeon to maintain adequate and accurate records relating to the provision of services to their patients constitutes unprofessional conduct.

7. Section 125.3 of the Code provides, in pertinent part, that the Division may request the administrative law judge to direct a licentiate found to have committed a

1. All statutory references are to the Business and Professions Code (Code) unless otherwise indicated.

1 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
2 investigation and enforcement of the case.

3 8. Section 14124.12 of the Welfare and Institutions Code states, in pertinent
4 part:

5 “(a) Upon receipt of written notice from the Medical Board of California, the
6 Osteopathic Medical Board of California, or the Board of Dental Examiners of California,
7 that a licensee's license has been placed on probation as a result of a disciplinary action,
8 the department may not reimburse any Medi-Cal claim for the type of surgical service or
9 invasive procedure that gave rise to the probation, including any dental surgery or
10 invasive procedure, that was performed by the licensee on or after the effective date of
11 probation and until the termination of all probationary terms and conditions or until the
12 probationary period has ended, whichever occurs first. This section shall apply except in
13 any case in which the relevant licensing board determines that compelling circumstances
14 warrant the continued reimbursement during the probationary period of any Medi-Cal
15 claim, including any claim for dental services, as so described. In such a case, the
16 department shall continue to reimburse the licensee for all procedures, except for those
17 invasive or surgical procedures for which the licensee was placed on probation.”

18 FIRST CAUSE FOR DISCIPLINE

19 (Gross Negligence)

20 9. Respondent is subject to disciplinary action under section 2234, subsection
21 (b), of the Code in that he committed gross negligence in the care and treatment of patient G.J.²
22 The circumstances are as follows:

23 10. On or about October 12, 1998, patient G.J., a male patient who was fifty-
24 seven years old at the time, saw Respondent with a complaint of headache. Previously the patient
25 had been treated for minor medical problems such as hypertension, obesity, and upper respiratory
26

27
28 2. The names of patients are kept confidential to protect their privacy rights. The
patient names will be revealed to Respondent upon receipt of his written request for discovery.

1 infections, but he had never before complained to Respondent about headaches. The specific
2 complaint respondent recorded in the patient's medical records was for "headache times 6 days
3 ago," yet Respondent does not state whether the patient was still suffering from a headache.
4 Respondent recorded an abbreviated history of present illness which stated only "Six day left
5 temple headache, increased blood pressure, patient stressed." Respondent noted physical
6 examination findings of blood pressure of 170/90, otherwise normal vital signs, and tenderness
7 of the left temple. No other physical examination was documented and there is no indication in
8 the patient records that a neurologic, head-eyes-ears-nose-throat, or neck examination was
9 performed. Respondent's assessment was "hypertension and stress headache," and he treated the
10 patient with prescriptions for Lotensin (an anti-hypertensive agent) and Lodine (a non-steroidal
11 anti-inflammatory drug).

12 11. On or about October 20, 1998, patient G.J. saw Respondent again to
13 "recheck blood pressure," according to Respondent's patient notes. The patient told Respondent
14 that his headache was improved with alcohol. Respondent did not obtain a significant medical
15 history. A physical examination was performed and noted blood pressure of 138/82 and "modest
16 trapezial spasm." Respondent also noted tenderness of the "temple, nuchal" without explaining
17 what this meant. Respondent did not document a neurological examination. Respondent's
18 assessment was "hypertension and stress," and he treated the patient by increasing the dosage of
19 Lotensin from ten milligrams per day to twenty milligrams per day.

20 12. On or about October 22, 1998, patient G.J. collapsed while at work and
21 was taken to the Irvine Medical Center in critical condition. He was ultimately diagnosed as
22 suffering from a massive sub-arachnoid hemorrhage and died later that day.

23 13. Respondent committed gross negligence in the overall care and treatment
24 of patient J.G. based upon the following acts and/or omissions, taken together:

25 A. By failing to obtain a meaningful medical history from the patient on or
26 about October 12, 1998;

27 B. By failing to perform a significant physical examination on or about
28 October 12, 1998;

1 C. By failing to consider and document a differential diagnosis on or about
2 October 12, 1998;

3 D. By failing to obtain a meaningful interval medical history from the patient
4 on or about October 20, 1998;

5 E. By failing to perform a significant physical examination on or about
6 October 20, 1998; and

7 F. By failing to recognize and/or understand the concept of a "sentinel
8 bleed" in relation to his assessment of the patient.

9 SECOND CAUSE FOR DISCIPLINE

10 (Incompetence)

11 14. Respondent is subject to disciplinary action under section 2234, subsection
12 (d), of the Code in that he exhibited incompetence in the care and treatment of patient G.J. The
13 circumstances are as follows:

14 15. Paragraphs 10 through 12 are incorporated by reference as if set forth in
15 full.

16 16. Respondent exhibited incompetence in the care and treatment of patient
17 G.J. as follows:

18 A. By failing to obtain a meaningful medical history from the patient on or
19 about October 12, 1998;

20 B. By failing to perform a significant physical examination on or about
21 October 12, 1998;

22 C. By failing to consider and document a differential diagnosis on or about
23 October 12, 1998;

24 D. By failing to obtain a meaningful interval medical history from the patient
25 on or about October 20, 1998;

26 E. By failing to perform a significant physical examination on or about
27 October 20, 1998; and

28 F. By failing to recognize and/or understand the concept of a "sentinel

1 bleed" in relation to his assessment of the patient.

2 THIRD CAUSE FOR DISCIPLINE

3 (Record Keeping)

4 17. Respondent is subject to disciplinary action under section 2266 of the
5 Code in that he committed unprofessional conduct by failing to maintain adequate and accurate
6 records in the care and treatment of patient G.J. The circumstances are as follows:

7 18. Paragraphs 10 through 12 are incorporated by reference as if set forth in
8 full.

9 19. Respondent committed unprofessional conduct by failing to maintain
10 adequate and accurate records as follows:

11 A. By failing to record the results of a meaningful medical history from the
12 patient on or about October 12, 1998;

13 B. By failing to record the results of a significant physical examination on or
14 about October 12, 1998;

15 C. By failing to document a differential diagnosis on or about
16 October 12, 1998;

17 D. By failing to record a meaningful interval medical history from the patient
18 on or about October 20, 1998; and

19 E. By failing to record the results of a significant physical examination on or
20 about October 20, 1998.

21 PRAYER

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein
23 alleged, and that following the hearing, the Division of Medical Quality issue a decision:

24 1. Revoking or suspending Physician & Surgeon's Certificate Number
25 G55750, issued to Pedro Carrillo, M.D.;


26 2. Revoking, suspending or denying approval of Pedro Carrillo, M.D.'s
27 authority to supervise physician's assistants, pursuant to section 3527 of the Code;

28 3. Ordering Pedro Carrillo, M.D. to pay the Division of Medical Quality the

1 reasonable costs of the investigation and enforcement of this case, and, if placed on probation,
2 the costs of probation monitoring;

3 4. Taking such other and further action as deemed necessary and proper.

4 DATED: December 11, 2002

5
6 
7 _____
8 RON JOSEPH
9 Executive Director
10 Medical Board of California
11 Department of Consumer Affairs
12 State of California
13 Complainant

11 03573160-LA02 2200

12 jd 11/19/02